



March 26, 2024

**VIA ECF**

Hon. Daniel J. Stewart  
U.S. Magistrate Judge  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, NY 12207

Re: *Prime Capital Ventures, LLC v. Reign International Financial, et al.*  
1:23-CV-00207 (FJS/DJS)

Dear Judge Stewart:

I've just been retained by Defendants in this matter and write to provide a status report as directed by the Court's February 26, 2024 Order. I've reached out to prior counsel Adam Shaw, Esq. to get a copy of the file and have also connected with Plaintiff's counsel Daniel S. Rubin, Esq. to confirm my understanding of where this matter is at, which is that Defendants have a Motion to Compel Arbitration and Motion to Dismiss pending while Plaintiff has a Motion to Amend and file a Second Amended Complaint pending. Both motions are fully submitted. There are no deadlines at the moment. I intend to speak with my clients further, review prior counsel's file, the docket, and the pending motions in this matter and should be up to speed by the time the Court renders decisions. To the extent the Court wishes to hold a status conference I will make myself available.

Thank you for your time and attention to this matter. Should the Court need anything further of me at the moment, please contact my office.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew A. Toporowski".

Matthew A. Toporowski, Esq.

Cc: Daniel S. Rubin, Esq. (*via ECF*)  
Patrick J. Fitzgerald, III, Esq. (*via ECF*)  
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